

EXHIBIT D

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

--oOo--

WAYMO LLC,

Plaintiff,

vs.

Case

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING LLC,
Defendants.

_____/

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF SALLE YOO

VOLUME II

THURSDAY, DECEMBER 14, 2017

Reported by:

Anrae Wimberley

CSR No. 7778

Job No. 2771310

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1 A. I'm not sure. 15:50:06

2 Q. You're aware of one hold?

3 A. I'm aware of at least one.

4 Q. Does Uber's litigation hold include

5 language regarding ephemeral chat platforms? 15:50:14

6 A. As I sit here, I don't know.

7 Q. Are you aware of any language in the hold
8 document that concerns ephemeral messaging systems?

9 A. I don't know. But the policy of the
10 company was that if you were on hold, that you did 15:50:34
11 not talk about those topics on any sort of chat app.

12 MR. VERHOEVEN: I'll move to strike as
13 nonresponsive everything after "I don't know."

14 BY MR. VERHOEVEN:

15 Q. When did the Uber litigation hold go into 15:50:57
16 effect with respect to this lawsuit?

17 A. I don't have the exact date, but it would
18 be shortly after the lawsuit was filed and we
19 received notice of it.

20 Q. In February, March, April? 15:51:10

21 A. No, I don't think it was April. I would
22 think it was either in February or early March,
23 depending on when it was implemented.

24 Q. Did Uber implement a litigation hold in
25 connection with the Stroz investigation? 15:51:21

1 FEDERAL CERTIFICATE OF DEPOSITION OFFICER
2 I, ANRAE WIMBERLEY, CSR NO. 7778, do hereby
declare:

3 That, prior to being examined, the witness
named in the foregoing deposition was by me duly
4 sworn pursuant to Section 30(f)(1) of the Federal
Rules of Civil Procedure and the deposition is a
5 true record of the testimony given by the witness;

6 That said deposition was taken down by me in
shorthand at the time and place therein named and
7 thereafter reduced to text under my direction;

8 --X-- That the witness was requested to
review the transcript and make any changes to the
9 transcript as a result of that review pursuant to
Section 30(e) of the Federal Rules of Civil
10 Procedure;

11 ----- No changes have been provided by the
witness during the period allowed;

12 ----- The changes made by the witness are
13 appended to the transcript;

14 ----- No request was made that the
transcript be reviewed pursuant to Section 30(e) of
15 the Federal Rules of Civil Procedure.

16 I further declare that I have no interest in
the event of the action.

17 I declare under penalty of perjury under the
18 laws of the United States of America that the
foregoing is true and correct.

19 WITNESS my hand this 15th day of December,
20 2017.

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22
23
24 

25 ANRAE WIMBERLEY, CSR NO. 7778